

Hearing Date: June 6, 2023 at 11:00 a.m. (prevailing Eastern Time)
Objection Deadline: June 3, 2023 at 4:00 p.m. (prevailing Eastern Time)

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Counsel to the Plan Administrator

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

VOYAGER DIGITAL HOLDINGS, INC., *et al.*,¹

Debtors.

)
) Chapter 11
)
) Case No. 22-10943 (MEW)
)
) (Jointly Administered)
)

NOTICE OF FILING OF FIRST AMENDED LIQUIDATION PROCEDURES

PLEASE TAKE NOTICE that the above-captioned debtors (collectively, the “Debtors”) toggled to the Liquidation Transaction pursuant to the *Third Amended Joint Plan of Voyager Digital Holdings, Inc. and Its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code* [Docket No. 1166-1] (the “Plan”).²

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are: Voyager Digital Holdings, Inc. (7687); Voyager Digital Ltd. (7224); and Voyager Digital, LLC (8013). The location of the Debtors’ principal place of business is 33 Irving Place, Suite 3060, New York, NY 10003.

² Capitalized terms used but not otherwise defined herein have the meanings ascribed to them in the Plan.

PLEASE TAKE FURTHER NOTICE that on May 5, 2023, the Debtors, pursuant to Article IV.D.1 of the Plan, filed the Liquidation Procedures (the “Liquidation Procedures”).

PLEASE TAKE FURTHER NOTICE that the Plan Administrator established under the Plan hereby files the First Amended Liquidation Procedures, which are attached hereto as **Exhibit 1**.³

PLEASE TAKE FURTHER NOTICE that pursuant to the *Order (I) Approving the Liquidation Procedures and (II) Granting Related Relief* [Docket No. 1398], the Plan Administrator is providing seven calendar days’ notice of the First Amended Liquidation Procedures prior to proceeding with the transactions contemplated thereby.

PLEASE TAKE FURTHER NOTICE that any responses or objections to the Liquidation Procedures shall: (a) be in writing; (b) conform to the Federal Rules of Bankruptcy Procedure, the Local Bankruptcy Rules for the Southern District of New York, and all General Orders applicable to chapter 11 cases in the United States Bankruptcy Court for the Southern District of New York; (c) be filed electronically with the Court on the docket of *In re Voyager Digital Holdings, Inc.*, No. 22-10943 (MEW) by registered users of the Court’s electronic filing system and in accordance with all General Orders applicable to chapter 11 cases in the United States Bankruptcy Court for the Southern District of New York (which are available on the Court’s website at <http://www.nysb.uscourts.gov>); and (d) be served in accordance with the *Final Order (I) Establishing Certain Notice, Case Management, and Administrative Procedures and (II) Granting Related Relief* [Docket No. 240] by **June 3, 2023, at 4:00 p.m., prevailing Eastern Time** (the “Objection Deadline”), on (i) the entities on the Master Service List available on the

³ A redline of the First Amended Liquidation Procedures to the Liquidation Procedures is attached hereto as **Exhibit 2**.

case website of the Debtors at <https://cases.stretto.com/voyager> and (ii) any person or entity with a particularized interest in the subject matter of the First Amended Liquidation Procedures.

PLEASE TAKE FURTHER NOTICE that if no objections or other responses are timely filed and served by the Objection Deadline with respect to the First Amended Liquidation Procedures, the Plan Administrator shall proceed with and effectuate the First Amended Liquidation Procedures.

PLEASE TAKE FURTHER NOTICE that if a written objection to the First Amended Liquidation Procedures is timely filed and remains unresolved, such objection will be heard on **June 6, 2023, at 11:00 a.m., prevailing Eastern Time** (the “Hearing”). In accordance with General Order M-543 dated March 20, 2020, the Hearing will be conducted telephonically. Any parties wishing to participate must do so by making arrangements through CourtSolutions by visiting <https://www.court-solutions.com>.

PLEASE TAKE FURTHER NOTICE that copies of the First Amended Liquidation Procedures and other papers filed in these chapter 11 cases may be obtained free of charge by visiting the website of Stretto at <https://cases.stretto.com/Voyager>. You may also obtain copies of the First Amended Liquidation Procedures and other papers filed in these chapter 11 cases by visiting the Court’s website at <http://www.nysb.uscourts.gov> in accordance with the procedures and fees set forth therein.

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Dated: New York, New York
May 27, 2023

MCDERMOTT WILL & EMERY LLP

/s/ Darren Azman

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